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Petco Animal Supplies Stores, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KISHA HILL,

Plaintiff,

vs.

PETCO ANIMAL SUPPLIES STORES, INC.,
a Foreign Corporation Licensed to do Business
in Nevada,

Defendant.

Case No.: 2:23-cv-01002-RFB-VCF

**STIPULATION AND ORDER
EXTENDING TIME FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S
COMPLAINT (ECF No. 1-1)
(FIRST REQUEST)**

Defendant Petco Animal Supplies Stores, Inc. ("Petco" Or "Defendant"), by and through its counsel of record, the law firm of Jackson Lewis P.C., and Plaintiff Kisha Hill ("Plaintiff"), by and through her counsel of record, the Law Office of Mary F. Chapman, Ltd., hereby stipulate and agree to extend the time for Defendant Petco to file its response to Plaintiff's Complaint (ECF No. 1-1) up to and including **July 28, 2023** based on the following:

1. This is the first stipulation to extend the time for Defendant to respond to Plaintiff's Complaint.
2. Defendant was served with the Summons and Complaint on June 8, 2023 and removed the case to this Court on June 29, 2023 (ECF No. 1), making Defendant's response to Plaintiff's Complaint currently due on July 6, 2023.
3. Defendant asserts that Plaintiff and Defendant are party to a written agreement which provides that all disputes arising out of or related to Plaintiff's employment with Defendant

are subject to resolution by final and binding arbitration.

4. The parties have agreed to extend the deadline for Defendant to file its response to the Complaint to **July 28, 2023** to allow Plaintiff sufficient time to evaluate Defendant's information and request. Plaintiff's counsel will be out of the office from July 6 to July 16 and will also need time to consult with Plaintiff and her co-counsel.

5. The parties believe these circumstances constitute good cause for granting an extension to permit the parties to explore whether they can avoid motion practice related to the arbitration issue, conserving judicial resources. *See* Fed. R. Civ. P. 6(b)(1).

6. The parties are not waiving, relinquishing, or otherwise impairing any claim, defense, argument, or other right they may have by virtue of entering into this Stipulation. *Szanto v. Marina Marketplace 1, LLC*, No. 3:11-cv-00394-RCJ-VPC, 2013 U.S. Dist. LEXIS 168028, at *10 (D. Nev. Nov. 26, 2013).

Dated this 5th day of July, 2023.

LAW OFFICES OF MARY F. CHAPMAN,
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JACKSON LEWIS P.C.

/s/ Mary F. Chapman
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Attorneys for Plaintiff Kisha Hill

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ORDER

IT IS SO ORDERED.



~~United States District Judge~~
United States Magistrate Judge

Date: 7-5-2023